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Attorneys for Plaintiffs

L.C., I.H., A.L., and

ANTONIA SALAS UBALDO

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA
SALAS UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISIAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

[Consolidated for purposes of discovery
with *Botten, et al. v. State of California,*
et al., Case No. 5:23-cv-00257-KK-
SHK]

Honorable Kenly Kiya Kato
Mag. Judge Shashi H. Kewalramani

**PLAINTIFFS' RULE 26 INITIAL
EXPERT DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26, L.C., a minor by and through her guardian *ad litem* Maria Cadena, individually and as successor-in-interest to Hector Puga; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez, individually and as successor-in-interest to Hector Puga; A.L., a minor by and through her guardian *ad litem* Lydia Lopez, individually and as successor-in-interest to Hector Puga; and Antonia Salas Ubaldo, individually, hereby make their initial expert disclosures pursuant to Rule 26(a)(2)(A) and (C) of the Federal Rules of Civil Procedure as follows:

RETAINED EXPERTS

Plaintiffs disclose the following retained expert witnesses who may be called upon to give expert testimony at trial pursuant to Rule 26(a)(2)(A) of the Federal Rules of Civil Procedure:

1. **Roger Clark** - Police Practices Expert

10207 Molino Road

Santee, CA 92071

(203) 351-2458

Mr. Clark's Rule 26 report, C.V., fee schedule, and list of prior sworn testimony are collectively attached hereto as "Exhibit 1."

2. **Matthew Kimmis** – Video Analysis and Graphics Expert

2458 Maplewood Drive SE

Grand Rapids, MI 49506

(415) 225-3962

Mr. Kimmis's Rule 26 Report, C.V., fee schedule, and list of prior sworn testimony are collectively attached hereto as "Exhibit 2."

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1 **NON-RETAINED EXPERTS**

2 Plaintiffs further identify expert witnesses who may present evidence pursuant
3 to Rules 702, 703, or 705 of the Federal Rules of Evidence, but who are not retained
4 by Plaintiffs to provide expert testimony. Plaintiffs hereby disclose the following
5 witnesses and submit the following summaries of the witness' expected testimony
6 pursuant to Rule 26(a)(2)(A) and (C):

- 7 1. Sergeant Robert Ripley – San Bernardino Sheriff's Department, Specialized
8 Investigations Division
9 c/o County Defense Counsel

10 Sergeant Ripley was the main detective who processed the incident scene and
11 undertook the crime scene investigation. Sergeant Ripley also conducted the interview
12 of Deputy Adams and two witness interviews. Sergeant Ripley worked alongside
13 Crime Scene Specialist Christopher Hermosillo in processing the incident scene and
14 documented all the evidence found in a report. Sergeant Ripley also took
15 measurements of various physical evidence. Sergeant Ripley is expected to testify
16 regarding all the evidence that he found at the scene in relation to the incident,
17 including but not limited to bullet casings, bullets, bullet strikes, weapons, blood
18 stains, and Mr. Puga's body position and final resting place.

- 19 2. Christopher Hermosillo – San Bernardino Sheriff's Department Crime
20 Scene Specialist
21 c/o County Defense Counsel

22 Mr. Hermosillo was the Crime Scene Specialist who assisted Sergeant Ripley with the
23 crime scene investigation. Mr. Hermosillo took photographs of the scene, labeled
24 evidence found at the scene, photographed each item of evidence prior to it being
25 measured and collected as evidence, measured evidence, and attempted to determine
26 bullet trajectories of found bullet entry/exit holes. Mr. Hermosillo further took
27 photographs of significant aspects of Mr. Puga's autopsy and collected samples of
28 Mr. Puga's head hair, fingernail clippings, blood and fingerprints and other evidence.

1 Mr. Mr. Hermosillo also processed collected evidence at the crime lab. Mr.
2 Hermosillo is expected to testify regarding the evidence observed and collected at the
3 scene, the evidence observed and collected at Mr. Puga's autopsy, and evidence
4 processed at the crime lab.

5 3. Timony Jong, M.D. – Forensic Pathologist

6 Dr. Jong was the forensic pathologist who performed the autopsy of Hector
7 Puga. Dr. Jong is expected to testify on the autopsy she performed on Mr. Puga, the
8 external examination of Mr. Puga's body, the nature and extent of Mr. Puga's injuries,
9 the cause and manner of the injuries found on Mr. Puga's body, the trajectory of the
10 gunshot wounds to Mr. Puga's body, the internal examination of Mr. Puga's body,
11 any other findings from Mr. Puga's autopsy, and the manner and cause of death.

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13 DATED: January 30, 2025

LAW OFFICES OF DALE K. GALIPO

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15 Bv


16 Dale K. Galipo
17 Hang D. Le
18 Attorneys for Plaintiffs
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